



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
STATION PLACE
100 F STREET, NE
WASHINGTON, DC 20549-2465

Office of FOIA Services

February 6, 2019

Mr. Sammy Nikols
MuckRock News
DEPT MR 47006 411A Highland Ave
Somerville, MA 02144-2516

Re: Freedom of Information Act (FOIA), 5 U.S.C. § 552
Request No. **18-00702-FOIA**

Dear Mr. Nikols:

This letter is our final response to your request, dated December 26, 2017, and received in this office on December 27, 2017, for information concerning 28 different types of SEC records, including EEO policies and harassment.

Reference is also made to our letter dated January 2, 2018, in which we addressed your request for a fee waiver and we also advised you that the search for responsive records would require us to consult with several different offices throughout the SEC and the potential amount of records (and their review) may be voluminous, and that if requested, we would process them on our First-in, First-out (FIFO) track.

By e-mail dated April 9, 2018, you narrowed the scope of your request to seek the following:

1. (Previous item 6 in your original request) All records sufficient to identify the dates, titles, role performed, SK and SO levels, and offices held by "Gottesman" during his employment at the Securities and Exchange Commission, all employee handbooks, policies, or rules that applied to those titles, roles, and offices for those date.
2. (Part of previous item 7) Please provide the syllabi for the following leadership programs implemented at the Securities and Exchange Commission:
 - a. Emotional Intelligence and Understanding Your Behavior Style;
 - b. Leadership Communication;
 - c. Leadership Presence;
 - d. Coaching Skills for Leaders; and Dynamics of Teams and Groups.

In response to your narrowed request, access is granted to the enclosed 160 pages of records except for information protected under 5 U.S.C. § 552(b)(2) and (b)(6). Under Exemption 2, the records are being withheld since they relate solely to the internal personnel rules and practices of the SEC. Under Exemption 6, the release of these records would constitute a clearly unwarranted invasion of personal privacy.

With regard to item number 2 of your request, we conducted a thorough search of the SEC's various systems of records, but did not locate or identify any information responsive to your request.

If you still have reason to believe that the SEC maintains the type of information you seek, please provide us with additional information, which could prompt another search. Otherwise, we conclude that no additional responsive information exists and we consider this request to be closed.

I am the deciding official with regard to this adverse determination. You have the right to appeal my decision and/or the adequacy of our search or findings of no responsive information to the SEC's General Counsel under 5 U.S.C. § 552(a)(6), 17 CFR § 200.80(f)(1). The appeal must be received within ninety (90) calendar days of the date of this adverse decision. Your appeal must be in writing, clearly marked "Freedom of Information Act Appeal," and should identify the requested records. The appeal may include facts and authorities you consider appropriate.

You may file your appeal by completing the online Appeal form located at https://www.sec.gov/forms/request_appeal, or mail your appeal to the Office of FOIA Services of the Securities and Exchange Commission located at Station Place, 100 F Street NE, Mail Stop 2465, Washington, D.C. 20549, or deliver it to Room 1120 at that address.

If you have any questions, please contact Carl Rollins of my staff at rollinsc@sec.gov or (202) 551-8329. You may also contact me at foiapa@sec.gov or (202) 551-7900. You may also

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contact the SEC's FOIA Public Service Center at foiapa@sec.gov or (202) 551-7900. For more information about the FOIA Public Service Center and other options available to you please see the attached addendum.

Sincerely,

Aaron Taylor
FOIA Branch Chief

Enclosure

ADDENDUM

For further assistance you can contact a SEC FOIA Public Liaison by calling (202) 551-7900 or visiting <https://www.sec.gov/oso/help/foia-contact.html>.

SEC FOIA Public Liaisons are supervisory staff within the Office of FOIA Services. They can assist FOIA requesters with general questions or concerns about the SEC's FOIA process or about the processing of their specific request.

In addition, you may also contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA dispute resolution services it offers. OGIS can be reached at 1-877-684-6448 or via e-mail at ogis@nara.gov. Information concerning services offered by OGIS can be found at their website at [Archives.gov](https://www.archives.gov). Note that contacting the FOIA Public Liaison or OGIS does not stop the 90-day appeal clock and is not a substitute for filing an administrative appeal.